

November 3, 2000

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California Public Utilities Commission
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The Los Angeles County Metropolitan Transportation Authority (LACMTA) would like to submit the following comments/suggestions to improve the priority list formula for grade separation.

The current formula is as follows:

$$P = \frac{V \times (T + 0.1 \text{ LRT}) (AH + BD)}{C \times F} + SCF$$

The LACMTA feels that changes to the formula are required to give Light Rail properties a chance at obtaining some of the funds made available by the state under S & H Code 2450.

The LACMTA would like to discuss the following at the upcoming workshop and would like to propose certain changes to the formula:

LRT Volumes

The LACMTA disagrees with the 10% multiplier imposed on the LRT volumes. When the formula was written in 1990, LRT was still in its infancy. Since 1990, Light Rail properties have expanded their services and increased frequencies of their trains. Potential hazards associated with these increases should be taken under consideration in the formula.

Cost

The LACMTA feels that too much emphasis is placed on the cost factor in the formula and not on the primary reason behind granting grade separation funding. The exposure for a crash between vehicles and trains and the potential for accidents to occur (exposure) criteria should be the primary basis for project prioritization. The cost factor dramatically reduce the primary exposure, reducing the level of priority for projects, which is contrary to the determination of projects urgently in need of separation. Added, costs associated with grade separations for LRT's are much greater than costs associated with freight and commuter trains due to demographic and other geometric considerations.

Accident History

The LACMTA and the Los Angeles Department of Transportation (LADOT) agree that points assigned to each accident are inappropriate. The LACMTA feels that the number of points assigned

should correspond to the number of train/LRT involved incidents at the crossing regardless to the number of fatalities and injuries. Any incident has the potential of resulting in either a fatality or injury.

Exclusive Light Rail projects eligibility

The LACMTA feels that exclusive Light Rail properties should be allowed to participate and compete for funds under S & H 2450. We would like to discuss this issue at the upcoming workshop.

If you have any comments or questions regarding the above, please contact me at (213) 922-7396.

Sincerely,

Abdul Zohbi
Manager, System Safety